



SCOTT A. THOMPSON
Executive Director

OKLAHOMA DEPARTMENT OF ENVIRONMENTAL QUALITY

KEVIN STITT
Governor

29 June 2020

Katrina Higgins-Coltrain
Remedial Project Manager
U.S. Environmental Protection Agency, Region 6
Remedial Branch (SEDRL)
1201 Elm Street, Suite 500
Dallas, Texas 75270-2102

RE: Feasibility Scoping Technical Memorandum, Wilcox Oil Company Superfund Site, Bristow, Creek County Oklahoma.

Mrs. Higgins-Coltrain,

Oklahoma Department of Environmental Quality (DEQ) received an electronic copy of the above-mentioned memorandum on June 6th, 2020. DEQ has completed its review and has the following comments:

- 1.) Addressing visible waste should be included as a Remedial Action Objection (RAO).
- 2.) Contaminated sediment is not addressed in the memorandum. DEQ feels that PRGs should be developed for sediments.
- 3.) How will groundwater be addressed in the Feasibility Study?
- 4.) In the development of PRGs for polycyclic aromatic hydrocarbons (PAHs), were additive effects considered?
- 5.) By policy, DEQ uses an excess cancer risk level of 10^{-5} . With regard to Benzo(a)pyrene, how was the PRGs developed?
- 6.) Arsenic should be included as a COC.
- 7.) Table 1: Citation "OAC 252: 650 and 652" should be revised to "OAC 252:652"
- 8.) Property owners must agree in writing to land use restrictions.
- 9.) DEQ would file any potential Institutional Controls.



10.) Alternatives considered to address soils is somewhat limited. Why did EPA not consider a treatment option for soil?

Feel free to contact me with any questions or concerns.

Sincerely,

A handwritten signature in blue ink that reads "W. Todd Downham". The signature is fluid and cursive, with a long horizontal stroke at the end.

Todd Downham
Environmental Programs Specialist IV
Department of Environmental Quality
Site Remediation Section
Land Protection Division

ec: Patrick Appel, EA